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DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

Date: 09/13/2001

To: Dan Chesterson
Site Assessment/Brownfields Section

Thru: Wilfred Michira
Steve Buckel

From: Craig Pender
OLQ Chemistry Section

Subject: Work Plan
Beck's Lake
South Bend, St. Joseph Co., Indiana
Site # IND980904375

The work plan, dated August 25, 2001 has been evaluated. Specific comments regarding this document appear below.

History

This site is an inactive open-style dump that was used in the 1950's and accepted industrial and residential waste. In the 1960's, this site became part of a city park named LaSalle Park. The site is located in a residential area on the western boundary of South Bend. An 8-acre lake named Beck's Lake and a man-made hill are located on the eastern half of the park.

A Screening Site Inspection Report (SSIR) was conducted and prepared by EPA in June 1989. Five surface soil samples were collected during the SSIR. According to the report, the Bendix Corp. may have disposed of wastes including organic and inorganic substances, solvents, heavy metals, acids, bases, asbestos, as well as other industrial waste products. In addition, other companies and individuals disposed of waste at this site.

Follow-up sampling was requested by the City of South Bend due to recent concerns associated with the lake being fished as well as residential concerns of contamination in their yards due to flooding of the lake.

Comments

1. It is stated in the work plan that all samples collected will be analyzed for full scan. It needs to be stated in the work plan what specific parameters and analytical methods the lab will need to use when analyzing the samples.

2. It appears that the proposed sampling locations (as indicated on the included map) might be sufficient to delineate the contamination. However, the nature and extent of the contamination will need to be confirmed by the sample analysis results generated by the laboratory. Further sampling and laboratory analysis will be required if the nature and extent of the contamination has not been determined with this first sampling event.
3. When analytical data will be used for determination of nature and extent as well as for closure, full QA/QC documentation will be required for the appropriate number of quarters to verify that concentrations are below closure levels. The data will be required for validation/verification and evaluation before closure will be considered by Chemistry.

The documentation requirements for analytical data, including field QA/QC measures and laboratory QA/QC results, can be found in multiple locations. For a more detailed list that includes explanation of the required items, please refer to the IDEM non-rule policy document, *Guidance to the Performance and Presentation of Analytical Chemistry Data*, Appendix II. This is available on the IDEM web site at:

http://www.in.gov/idem/olq/publications/guidance/Guide_to_Perf_Pres_Analy_Chem_Data.pdf. If the site is following RISC, the information can be found in Appendix 2 of the Risk Integrated System of Closure (RISC) Technical Guide, pages 8-11. The RISC Technical Guide is available on the IDEM web site at:
http://www.in.gov/idem/olq/risc/tech_guide/risc_app2.pdf.

Conclusion

After evaluating the document, it was determined that more information is needed to complete the work plan. Specific analytical methods the laboratory will need to use to analyze the samples needs to be included. All sample results that are to be submitted must contain full QA/QC documentation to allow for data validation.

cc: Sarah Finley, OLQ Science Services Geology Section